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May 20, 2021

VIA ECF

The Honorable Lorna Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The application is **GRANTED**. The parties shall brief Defendant's motion for summary judgment according to the following schedule:

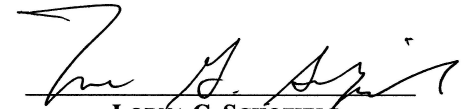
- by **June 8, 2021**, Defendants shall file their motion;
- by **July 13, 2021**, Plaintiff shall file his opposition; and
- by **July 30, 2021**, Defendants shall file their reply.

In filing their papers the parties shall comply with the page limits set forth in the Court's April 21, 2021, Order (Dkt. No. 51), and shall otherwise comply with this Court's Individual Rules. Absent compelling circumstances, no further extensions will be granted.

Dated: May 21, 2021

New York, New York

Re: ***Bautista v. Chanel, Inc., et al.***, Case No. 1:20-cv-04676-LGS



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

Our Firm represents Defendants Chanel, Inc. and Julie Papaioannou ("Defendants") in the above-referenced action. Consistent with Your Honor's Individual Rules and Procedures and Local Rule 7.1(d), we submit this letter to respectfully request a two-week extension of Defendants' May 25, 2021 deadline to file their motion for summary judgment. Plaintiff's counsel consents to this request.

On April 27, 2021, the Court issued an Order setting the following schedule for summary judgment: Defendants to file their motion by May 25, 2021; Plaintiff to file his opposition by June 22, 2021; and Defendants to file their reply by July 6, 2021. See ECF Doc. No. 51.

We make this request in light of scheduling conflicts posed by pre-planned vacations and religious holidays. This extension would require extensions of the deadlines to file the opposition and reply. After consulting with Plaintiff, the parties jointly propose the following revised summary judgment schedule:

- Defendants to file their motion for summary judgment by June 8, 2021;
- Plaintiff to file his opposition by July 13, 2021;¹ and
- Defendants to file their reply by July 30, 2021.

The parties have not previously requested an extension of the summary judgment schedule. This request is made in good faith and not for the purpose of causing undue delay. We thank the Court for its consideration of this request.

¹ Plaintiff requested an additional week to file his opposition due to his own scheduling conflicts stemming from the anticipated change in Defendants' deadline to file their motion.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Mary Ahrens Vadasz

Paul H. Galligan
Mary Ahrens Vadasz
Daniel I. Small

cc: Scott Simpson (via ECF)
Raya Saksouk (via ECF)